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Honorable Thomas O. Rice

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON
SPOKANE DIVISION**

JORDON KING, Individually and on)
Behalf of All Others Similarly Situated,)

Plaintiff,)

v.)

INLAND RESTORATION, INC. and)
STEVE KNIGHT,)

Defendants.)

NO. 2:23-cv-00040-ACE

JOINT STATUS CERTIFICATE

In response to the Notice Setting Court's Scheduling Conference setting this matter for a status conference, the parties, Defendants Inland Restoration, Inc. and Steve Knight, by their attorneys, Michael H. Church, Courtney J. Hagermann and Michael A. Leto of Stamper Rubens, P.S.; Plaintiff Jordon King by his attorney, Jon

1 Sanford of Sanford Law Firm, PLLC (collectively, the “Parties”), have conferred
2 pursuant to Rule 26(f) of the Federal Rules of Civil Procedure. The Parties’ position
3 with respect to the foregoing is as follows:

4 **a. Do jurisdiction and venue exist and, if they do exist, the basis for**
5 **each.**

6 The parties agree that jurisdiction and venue are proper.

7 **b. Is service of process complete and, if not, a deadline for completion.**

8 The parties agree that service of process is complete.

9 **c. A Brief Description of Claims and Defenses.**

10 Plaintiff alleges Defendants failed to include in its overtime calculations
11 certain bonuses paid to employees. Defendants deny Plaintiff’s claims and allege
bonuses were discretionary, and as a result were properly not included in bonus
calculations.

12 **d. Is a statute’s constitutionality being challenged, per Fed. R.**
13 **Civ.P.5.1, and has the required notice has been provided.**

14 The parties agree that a statute’s constitutionality is not being challenged.

15 **e. Should any issues be certified to a state supreme court.**

16 The parties agree that no issues should be certified to a state supreme court.

17 **f. Suggested deadline for adding additional parties, amending the**
18 **pleadings, and seeking class certification.**

1 August 1, 2023.

2 **g. Have all non-government corporate parties filed the necessary**
3 **ownership statement, see Fed. R. Civ. P. 7.1.**

4 Yes.

5 **h. Does the case involve a minor or incompetent party and is the**
6 **appointment of a guardian ad litem is necessary, see LCivR 17(c).**

7 The case does not involve a minor or incompetent party and that no
8 appointment of a guardian ad litem is necessary.

9 **i. Discovery:**

10 • **confirmation that initial disclosures, see Fed. R. Civ. P. 26(a)(1),**
11 **will be accomplished by the time of the hearing;**

12 The parties confirm that initial disclosures will be accomplished by the time
13 of the hearing.

14 • **subjects on which discovery may be needed;**

15 Facts and records related to wages Defendants paid to its employees.

16 Facts and records related to bonus compensation plans.

17 Information regarding certain employees to whom bonuses were paid.

1 • **any issues about preserving discoverable information, including**
2 **electronically stored information;**

3 Not at this time.

4 • **claims of privilege, protection of confidentiality, and proposed**
5 **confidentiality agreements;**

6 The parties agree that there are no claims of privilege, protection of
7 confidentiality and proposed confidentiality agreements at this time.

8 • **proposed agreements reached under Fed. R. Evid. 502;**

9 The parties agree that there are no proposed agreements reached at this time.

10 • **proposed modifications to the standard discovery procedures,**
11 **including bifurcation and/or consolidation of discovery, or an increase in the**
12 **allowed number of depositions (10), interrogatories (25), requests for**
13 **production (30), or requests for admission (15);**

14 The parties agree that there is no proposed modification to the standard
15 discovery procedures at this time.

16 • **suggested expert disclosure deadlines; and**

17 December 1, 2023.

- **suggested discovery cut-off;**

March 1, 2024.

j. Anticipated Motions and Suggested Dispositive Motion Filing Deadlines.

Both parties anticipate filing motions for summary judgment.

k. Trial:

- **whether a jury has been requested. In cases removed from state court in which a party desires a jury trial, a jury demand must be filed within 30 days after removal, see LCivR 38(d); F.**

The parties agree that a jury has not been requested at this time.

- **suggested trial date(s) and location;**

The parties agree upon the suggested trial date in June 2024.

- **anticipated length of trial.**

The parties anticipate the length of trial to be five (5) days.

- **requests for bifurcation.**

The parties agree that there are no requests for bifurcation at this time.

- **the need for special audio/visual courtroom technology.**

1 The parties agree that there is no need for special audio/visual courtroom
2 technology?

3 **l. The likelihood for settlement and the point at which the parties can**
4 **conduct meaningful dispute resolution.**

Mediation is scheduled for June 19, 2023.

5 **m. Any other matters that may be conducive to the just, speedy, and**
6 **inexpensive determination of the action.**

7 The parties agree that there are no other matters that may be conducive to the
8 just, speedy and inexpensive determination of the action at this time.

9 STAMPER RUBENS, P.S.

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By: /s/

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